

# **ConPlan Improvement Initiative (CII)**

## **Meeting Summary**

**Thursday, March 14, 2002**

**St. Regis Hotel—Potomac Room**

**Washington, DC**

### **Background**

The President's Management Agenda (PMA) directed the Office of Community Planning and Development (CPD) in the U.S. Department of Housing and Urban Development (HUD) to streamline and establish performance measurement standards for the Consolidated Plan (ConPlan) to make it more results-oriented and useful to communities in assessing their own progress toward addressing the problems of low-income areas.

The ConPlan serves as the application and planning tool for CPD Grantees pertaining to four formula grant programs; Community Development Block Grant (CDBG), The Home Improvement Partnerships Program (HOME), Emergency Shelter Grant (ESG) and Housing Opportunities for Persons With AIDS (HOPWA). To this end, CPD worked with the Office of Management and Budget (OMB) to develop a list of related subtasks which will be undertaken between now and September 30, 2003. To launch this activity, CPD Field Offices held regional meetings at the beginning of 2002 with their Grantees and other stakeholders to discuss these issues. On March 14, CPD convened a national planning meeting to introduce the concept of the ConPlan Improvement Initiative (CII) to a national audience which included staff from Public Interest Groups (PIGs), Grantees, other CPD stakeholders, CPD and HUD Headquarters staff, CPD Field Office staff and staff from OMB.

### **The ConPlan Improvement Initiative Meeting**

The 60 participants addressed the following issues, which were outlined in the PMA, as they pertained to the ConPlan:

- Reduce meaningless compliance burdens (i.e., streamline the plan)
- Make it more results oriented and useful for local communities to measure progress in addressing low-income areas.

In opening remarks, CPD stated "everything was on the table" with the understanding that all suggestions will be considered, but all may not result in recommendations being forwarded for statutory or regulatory change. OMB offered the perspective that CPD's ConPlan programs must show positive outcomes for continued investment, and looked forward to the development of performance measurement standards to rate programs in terms of their effectiveness to show that Federal funds are being invested properly in housing, community development and economic development initiatives. OMB offered some initial suggestions for improvement:

- *Using technology.* Technology can be used to pull the public into the planning process with the hopes of facilitating a shared vision among the community and local governing bodies
- *Crossing jurisdictional boundaries.* Redefine scope of the plan so that neighboring communities can work together toward a common goal.

### **Purpose and Audience of ConPlan**

Discussion ensued on the origin of the ConPlan process, from statutory requirements of the four formula grant programs, to Departmental regulations and guidance, including: planning, the application for federal funds, local program design and implementation, tracking and reporting.

Through a facilitated discussion, participants identified strengths and weaknesses of the current ConPlan process, and offered recommendations for improvements and alternatives. While consensus was reached on the ConPlan's general purpose and audience (see below), diverse ideas on how to meet statutory and regulatory program requirements emerged.

#### Purposes

- Develop housing strategies and goals.
- Ensure citizen involvement.
- Serve as an application for four Federal Block Grant programs (CDBG; HOME; HOPWA; ESG).
- Serve as a management tool to track results of programs funded by HUD.

#### Audiences

- Grantees
- Citizens
- HUD

### **Streamlining Improvements for ConPlan**

Participants felt the expansive reach of the ConPlan may be the root of its shortcomings, that is, it cannot be all things to all people. Weaknesses and other burdensome issues about the ConPlan were identified and could provide a basis for overall streamlining. These include:

- Overcomplicated – ConPlan is too large and needs to be simplified.
- Planning - Not all communities are not actively and consistently involved in the planning process and so for them maybe ConPlan does serve as a planning tool. However many communities have already been engaging in long and short term planning. For them, ConPlan does not make it easy to match those identified community priorities with HUD funding priorities. ConPlan is not linked easily even with other HUD plans: Continuum of Care, Public Housing Authority Plan, Analysis of Impediments, and Consortia. The ConPlan does not support cross-jurisdictional planning. Perhaps census data can be prepared with redefined

- geographical boundaries to facilitate co-planning among neighboring jurisdictions. It was noted that transportation issues are handled on a regional basis in locations across the United States.
- Citizen Participation - Perhaps technology (e.g., computers and software) can be used to integrate citizens into the planning process and build a community census or vision.
  - Accountability – is lacking, especially for low-income housing initiatives. Grantees want to know the bottom line. They don't mind being held accountable for CPD/HUD funding, but they want it to be made clear exactly for what they are being held accountable.
  - Goal-setting – not clearly addressed in ConPlan.
  - Tie Local Strategies to Local Needs – Market Analysis should be used to validate community need that, in turn, will direct strategies. In other words, needs should be linked directly to program implementation, and if not, consequences must be realized. A recommendation was made for CPD to disapprove ConPlan (upon submission) if program design does not attempt to meet identified need. CPD stated it does not have this authority, if and when planned actions are eligible program activities. Therefore, CPD may only disapprove a ConPlan, for example, for lack of completeness. This is because the purposes of the Act are so broad.
  - Software / Data Issues – The ConPlan process needs to address the utilization of software and data. There are numerous data issues including the release of the 2000 census information and the American Communities Survey census information which is expected to be released shortly and on a more routine basis between census.
  - Certification – The certification process seems meaningless, especially for States. (discussed in the context of States being required to certify that programs carried out by local jurisdictions are consistent with the State's ConPlan). Was also discussed that possibly some elements of the ConPlan could be reduced to just certifications which could then be verified during monitoring.
  - Consortia – Planning requirements for Consortia read logically in the ConPlan but do not work in reality; and the role of Consortia is not well defined.

### **Eliminating Components**

Participants also recommended the possibility of eliminating some aspects of the ConPlan process altogether. Comments / recommendations:

- Duplication – Too much duplication exists within the plan itself and between ConPlan and Continuum of Care Plan. Review elements to eliminate duplication.

- 5-year Term of ConPlan – Since jurisdictions must rely on HUD for the data component of the ConPlan (tabulated Census data) should ConPlan term be tied to the data source.
- Realistic timeframe - Comments from one participant that the success of the ConPlan is often political in nature (i.e., success seems to be predicated on strong vision of the chief elected official in any given jurisdiction). Since the ConPlan is a 3 to 5-year plan and an elected official usually serves a 4-year term, some ConPlans may become politically unrealistic. The Plan can also be impacted by national elections.
- Excessive Narrative Component – Narrative requirements are often result in wordy explanations and should be eliminated. Particularly those that don't result in positive outcomes, such as barriers to affordable housing, analysis of impediments, the anti-poverty strategy and lead-based paint initiatives. One participant felt the anti-poverty strategy is not its responsibility and shouldn't be part of the ConPlan. Ultimately, the extensive verbiage is due to an attempt to serve too many constituents (i.e., local citizens, local government, HUD, Congress, etc). ConPlan is set up to be all things to all people. One attendee added that the extensive verbiage may mask the bottom line—performance outcomes.
- CHAS – CHAS components should be eliminated because they are not used at the local level to make decisions.
- CAPER – The Consolidated Annual Performance Report (CAPER) should be revised to tie output and outcome reporting back to the planning process to hold the grantee accountable for its strategies.

### **Performance Measurement Improvements**

Establishing performance measurement standards also garnered significant comments from participants. They felt that such standards would provide accountability for HUD funds and give Grantees more direction on targeted outcomes. Comments / recommendations:

- Meet with OMB – Interest expressed to work directly with OMB to develop meaningful outcome criteria to meet OMB's level of expectation, and to ensure the continued success of CPD's programs. This stems from Grantees desire to receive more direction in setting goals, so that outcomes can be met realistically.
- Locally Focused Goals– Performance outcomes should be measured on specific local goals rather than overarching general goals set by CPD/HUD, and ratings should take into consideration jurisdiction-specific resources and market-based realities.
- Outputs and Outcomes – define logically; need to be flexible for State and local governments. Flexibility will make accountability more useable. Establish criteria

for Grantees to quantify and qualify their performances. Grantees should be rated on the degree to which output and outcomes match their locally identified needs.

- **Outputs and Outcomes** – should be measured simultaneously to present a better picture of how funds are being used. The ConPlan should not focus only on outcomes and ignore outputs. Outputs are severely affected by market-based realities (e.g., the economy and demographic variables), which often change so rapidly that Grantees can't address them fast enough. This doesn't mean that funds aren't being used effectively; it just means that funds may be going to projects other than those originally planned. If ConPlan is going to be based on performance, it needs to take into account market-based realities. One participant suggested that ConPlan should be a tool to hold localities accountable for *how* the money is spent, not just on *what* program the money is being spent.
- **Data Standard** – meaningful data standards must be used that are readily available to CPD and Grantees, is useful and has significance to jurisdictions at the local level, and is conducive to meeting CPD/HUD and OMB reporting requirements. Discussion ensued on usefulness of decennial Census data—out of date two years after published, and the upcoming American Community Survey data as a potential standard.
- **Software Reporting Tool** – Grantees need a short, straightforward mechanism (perhaps a Windows-based system) to report outputs and outcomes so that data can be used by CPD/HUD while being understood by the public. Current reporting methods, such as the Integrated Disbursement and Information System (IDIS) and CAPER, aren't working in this respect.
- **Data Focus** – Grantees should be required to provide only data necessary to reflect an accurate performance rating—CPD/HUD and OMB should understand not all data is useful. Especially data that does not reflect how Grantees use CPD/HUD funds to meet local needs. For example, Grantees may have insufficient funds to address an identified community need, or a community may decide to target a specific neighborhood for improvement, leaving another identified need unmet.
- **Grantee Diversity** – ConPlan should recognize the diversity of Grantees, e.g. States, Cities, Counties, and allow flexibility in meeting Federal requirements.

### **Process**

Discussion during the afternoon session set the groundwork for the streamlining process and the creation of performance standards for outcome measurement. Participants agreed that addressing these issues would be best served by small working groups, each consisting of approximately 15 people. The working groups should represent the entire scope of people involved in and affected by the ConPlan, including Grantee practitioners; HUD staff; Public Interest Groups (PIGs); other stakeholders; and when necessary, outside expertise, such as OMB.

Five, diverse working groups will (1) identify areas of the ConPlan that need streamlined, (2) examine performance measurement standards and suggest criteria, and (3) assess programs worthy of providing the basis for pilots. These working groups will draw from volunteers across the country. There will be one working group for each of the following entities:

- States
- Consortia
- Counties
- Cities (CDBG-only)
- Cities (multi-funded)

The working groups are encouraged to gain input from a variety of groups, for example low-income residents and non-profit faith-based providers, and address each of the following themes as it pertains to their specific jurisdiction-type:

1. What is the purpose of the ConPlan and what audience does it serve?
2. How can the ConPlan be linked to, or build upon, other plans? (including statewide Comprehensive Plans, e.g. State of Georgia)
3. What are the key data elements of the ConPlan?
4. How should Grantees establish goals?
5. What information should Grantees provide in reporting accomplishments?

A matrix of common themes and principles was developed to guide the working groups in addressing their assignments. Appendix A clearly indicates the universal nature of these principles as they cut broadly across the five themes.

### **Steering Committee**

A Steering Committee will coordinate the work of the five working groups and make recommendations to CPD for changes that address the issues specified in the PMA. The Steering Committee includes the following volunteers:

#### HUD

- Ann Doody Wiedl, Director, Office of Community Planning and Development (CPD), St. Louis Field Office
- Suzanne Hayes, ConPlan Specialist, Chicago Field Office
- Steve Sachs, Director, CPD, San Francisco Field Office

#### Grantee Public Interest Groups (PIGs) and Other Stakeholders

- Sheila Crowley, President, National Low Income Housing Coalition
- Jeff Falcusan, Legislative Counsel, National Community Development Association (or someone else from NCDA)

- John Murphy, Executive Director, National Association for County Community and Economic Development (NACCED)
- Dianne Taylor, Executive Director, Council of State Community Development Agencies

### **Next Steps / Working Group Assignments**

CPD agreed to disseminate meeting notes the beginning of April. Participants agreed to forward volunteer names for working groups with complete contact information.

Working groups will meet throughout the summer—beginning of May—and are tentatively scheduled to submit their suggestions to the Steering Committee by the end of September, 2002. All five working groups will meet to discuss all issues emanating from the March 14 meeting (see Appendix A for guidance). Working group recommendations will be forwarded to the Steering Committee for review, prioritizing and forwarding to CPD for action.

CPD agreed to consider a suggestion to forward consensus recommendations' from the stakeholders immediately for consideration for pilots or on other areas now known to need improvement. Tentatively, evaluation of pilot programs will be implemented by March, 2003.

It is expected that low-cost technology options, e.g., teleconferencing, will be used for the purpose of bringing this diverse group together for Working Group meetings.

## Appendix 'A' – Themes and Principles Developed at March 14 Planning Meeting

Themes			Purpose/Audience	Link/Build Upon Other Plans	Data Elements	Goals	Accomplishments
Principles	<b>Streamlining</b>						
	Regs and Statutes	<ul style="list-style-type: none"> <li>What does HUD need? Citizens? Grantees? (pare down to bare essentials)</li> <li>Eliminate what?</li> <li>Substitute what?                             <ul style="list-style-type: none"> <li>Non-Housing Plan Anti-Poverty Strategy</li> <li>Lead-Based Paint</li> <li>Barriers to Affordable Housing</li> <li>Monitoring (91.230)</li> <li>Data</li> </ul> </li> </ul>	●	●	●	●	●
	Pilots/Waivers	<ul style="list-style-type: none"> <li>What is out there working now? Transferable?</li> <li>What are the possibilities?</li> </ul>		●	●	●	●
	Term of ConPlan	<ul style="list-style-type: none"> <li>Five Years realistic? 10 yrs? (Census data)</li> </ul>	●	●	●	●	●
	Regional Planning	<ul style="list-style-type: none"> <li>Geographically</li> <li>By Program                             <ul style="list-style-type: none"> <li>PHA Plans</li> <li>Continuum of Care</li> <li>Consortia</li> </ul> </li> <li>Other disciplines                             <ul style="list-style-type: none"> <li>Transportation</li> </ul> </li> </ul>	●	●	●	●	●
	Applicability	<ul style="list-style-type: none"> <li>for HUD funds only; not all things to all people</li> </ul>	●	●	●	●	●
	Technology	<ul style="list-style-type: none"> <li>To assist planning process</li> <li>For reporting purposes</li> </ul>	●	●	●	●	●
	Certifications	<ul style="list-style-type: none"> <li>Consistency</li> <li>Replace components of ConPlan                             <ul style="list-style-type: none"> <li>Keep on file vs. part of application</li> </ul> </li> </ul>	●	●	●	●	●
	<b>Performance Reporting</b>						
	Reporting	<ul style="list-style-type: none"> <li>What does HUD need? (incl GPRA)</li> <li>Define Outcomes</li> <li>Revise CAPER and tie to ConPlan and IDIS</li> </ul>	●	●	●	●	●
	Software	<ul style="list-style-type: none"> <li>Develop meaningful software that captures needed info</li> <li>Link planning to outputs and outcomes</li> </ul>		●	●	●	●
	Pilots and Waivers	<ul style="list-style-type: none"> <li>What is out there working now? Transferable?</li> <li>What are the possibilities?</li> </ul>		●	●	●	●
	National Database	<ul style="list-style-type: none"> <li>Necessary?</li> <li>Recognize diversity of activities and Grantees</li> </ul>	●		●	●	●
	Link Outputs / Outcomes to Identified Needs	<ul style="list-style-type: none"> <li>If not, why?</li> <li>If not, what consequences?</li> </ul>	●	●	●	●	●



## **Appendix 'B' – Meeting Agenda for March 14 CII Planning Meeting**

### **AGENDA CONPLAN IMPROVEMENT INITIATIVE MEETING Thursday, March 14, 2002 St. Regis Hotel - Potomac Room**

**Registration - 8:30 to 9:00 AM**

**I. Opening - 9:00 to 9:30 AM**

Welcome  
Introductions  
Purpose  
Deadline  
Ground Rules  
Goal/Objectives for the Day  
Schedule for the day

**II. Addressing Streamlining and Performance Outcomes - 9:30 to 12:00**

A) Purpose of ConPlan - 9:30 to 9:45 AM

**Break - 9:45 to 10:00 AM**

B) Strengths and Weaknesses/Improvements - 10:00 to 11:00 AM

C) Alternatives/Improvements/Outcomes- 11:00 to Noon

**Lunch - Noon to 1:30 PM - On your own**

**III. Prioritizing Issues (What) - 1:30 to 2:30 PM**

**Break - 2:30 to 2:45 PM**

**IV. Develop Strategy and Action Plan - 2:45 to 4:00 PM**

A) Process Options - How  
B) Pilots  
C) Who  
D) Where/How and When

**V. Wrap-Up - 4:00 to 4:30 PM**

Summary of the day  
Outcomes  
Next Steps